IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FLOYD HUNTER, :

Plaintiff,

v. : CASE NO. 2:20-cv-1617

:

:

PORTFOLIO RECOVERY ASSOCIATES, LLC,

:

Defendant.

:

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Allegheny County, Pennsylvania and in support thereof avers as follows:

- 1. Portfolio Recovery Associates, LLC. is a defendant in a civil action originally filed on June 10, 2020 in the Court of Common Pleas of Allegheny County, Pennsylvania titled *Floyd Hunter v. Portfolio Recovery Associates, LLC* and docketed to Case No. GD-20-006680.
- 2. The removal is timely under 28 U.S.C. § 1446(b). PRA received service of Plaintiff's Complaint by certified mail on October 13, 2020.
- 3. Pursuant to 28 U.S.C. § 1446, attached here as Exhibit A are copies of all process, pleadings, and orders filed in the state court action.
- 4. The District Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against PRA alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq.

5. On this date, PRA has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE, Defendant Portfolio Recovery Associates, LLC respectfully removes this case to the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER, LTD.

By: /s/Lauren M. Burnette
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: October 26, 2020

CERTIFICATE OF SERVICE

I certify that on October 26, 2020, a true copy of the foregoing document was served

as follows:

Via Email and US Mail Postage Prepaid
Joshua P. Ward
Kyle Steenland
The Law Firm of Fenters Ward
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206
JWard@FentersWard.com
KSteenland@FentersWard.com
Counsel for Plaintiff

Via Electronic Filing
Court of Common Pleas
Allegheny County
414 Grant St.
Pittsburgh, PA 15219

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: October 26, 2020